

November 18, 2004

Office of Nutritional Products, Labeling, and Dietary Supplement (HFS-800) Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835

DEC - 2 2004

Madam:

In order to comply with Part 101 Food Labeling, Subpart F Specific Requirements for Descriptive Claims that are Neither Nutrient Content nor Health Claims, I am submitting the following:

The name and address of the distributor of the dietary supplement that bears the statement

North American Pharmacal, Inc. 12 High Street Norwalk, CT 06851

The text of the statement that is being made is:

ARA Plus®

Formulated by Dr. Peter D'Adamo using arabinogalactans from the western larch tree. Arabinogalactans are high molecular weight polysaccharide sugars that support the immune system and colon health; quercetin and vitamin C reduce daily cell damage.

Directions: (1) capsule 1-3 times daily as a dietary supplement, or as directed by physician.

The name of the dietary supplement is: The Blood Type Diet®, ARA Plus®

I certify that the information contained in this notice is complete and accurate and that North American Pharmacal, Inc has substantiation that the statement is truthful and not misleading. If there is additional information required, please let me know as soon as

possible.

Cerely.

Martha Mosko D'Adamo

President

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